

# InterStudies GDPR Privacy Notice – Host Families

Edition 1  
May 2018



InterStudies collects a lot of data and information about the host families taking part in our programmes. This data is necessary in order for InterStudies to place a student with a host family. This privacy notice explains how and why we collect host family data, what we do with it, and what rights host families have.

## Privacy Notice (How we use student information)

InterStudies is a Private Limited Company, providing educational and cultural exchange programmes in the UK and Ireland. Our students come from all over the world, and have an age range of 13 to 19. Our students are placed with host families in the UK and Ireland.

Our Data Protection Officer is Bo Slot Larsen, Email: [dpo@interstudies.com](mailto:dpo@interstudies.com)

## Why do we collect and use host family information?

We collect and use host family information under the following lawful bases

- a. where it is necessary to fulfil our contractual obligations to the host family (Article 6 (b));
- b. where we have the consent of the data subject (Article 6 (a));
- c. where it is necessary for compliance with a legal obligation (Article 6 (c));
- d. where processing is necessary to protect the vital interests of the data subject or another person (Article 6(d));
- e. where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Article 6 (e)).

Where the personal data we collect about host family is sensitive personal data, we will only process it where:

- a. it is necessary to fulfil our contractual obligations;
- b. we have explicit consent;
- c. processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent; and / or
- d. processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Please see our Data Protection Policy for a definition of sensitive personal data.

## The categories of host family information that we collect, hold and share include:

- a. Personal information (such as name, address, and other contact details)
- b. Characteristics (such as ethnicity, language, medical conditions, nationality, country of birth, and general information about the daily life of you and your family)
- c. Information about daily life and events in your family throughout the exchange year. This category can potentially include information of a sensitive nature
- d. Sensitive information including details of any health problems you or your family suffer from and details of any criminal convictions held by you or any members of your family
- e. Personal information including your bank details

*InterStudies • 15 Annandale Street • Edinburgh EH7 4AW • United Kingdom*

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From time to time and in certain circumstances, we might also process personal data about host families, some of which might be sensitive personal data, including information about criminal proceedings / convictions, information about sex life and sexual orientation, child protection / safeguarding. This information is not routinely collected about host families and is only likely to be processed by InterStudies in specific circumstances relating to particular host families or students, for example, if a child protection issue arises or if a student or host family is involved in a criminal matter. Where appropriate, such information may be shared with external agencies such as the child protection team at the Local Authority, the Local Authority Designated Officer and / or the Police. Such information will only be processed to the extent that it is lawful to do so and appropriate measures will be taken to keep the data secure.

We collect information about host families when they apply to host with us, and update it throughout the application and screening process, as well as during the programme itself as and when new information is acquired.

## Collecting Host Family information

Whilst the majority of host family information you provide to us is mandatory, some of it is provided to us on a voluntary basis.

Where appropriate, we will ask host families for consent to process personal data where there is no other lawful basis for processing it, for example where we wish to use photos or images of students and their host families on our website or on social media to promote InterStudies activities or if we want to ask your permission to use your information for marketing purposes. Host families may withdraw consent at any time.

## Storing Host Family data

We are obliged to keep certain data in order to trace historical events. In order to comply with this obligation, certain Host Family data will be stored indefinitely when a host family has hosted a student. All data will be stored safely on our secure server.

Data which it is not necessary for us to store will be deleted in accordance with our data deletion policy.

Where a Host Family hosts for us repeatedly we renew the data we hold on our records at least every three years.

Personal information for families who have contacted us about hosting but not completed an application will be deleted after three years.

Personal information for families who have completed an application form but not hosted for us will be deleted after five years.

A significant amount of personal data is stored electronically, for example on our database or server. Some information is also stored in hard copy format.

Personal data for host families in Ireland will be transferred to the UK for processing in our head office.

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Personal data will be transferred to other countries in order to provide our partners in each student's home country, as well as our students and their natural parents, with appropriate information about where the student will be placed. In some cases this may include data of a sensitive nature.

Where the student your family hosts comes from outside the EU this data will be transferred outside the EU.

Appropriate steps will be taken to keep data secure when transferring it to other countries.

## Who do we share host family information with?

We routinely share host family information with:

- Our students and their natural parents
- Our partners in the students' home countries
- Our LSCs and other support staff
- The schools which our students attend, or which we apply to on the behalf of our students
- The local authority in each student's placement area
- Social Services / the local authority child protection team

From time to time we may also share host family information with other third parties. In the event that we share personal data with third parties we will provide the minimum amount of personal information necessary to fulfill the purpose. We do not share information about our host families with anyone without consent unless the law allows us to do so.

## Requesting access to your personal data

Under data protection legislation host families have the right to request access to information about them that we hold ("Subject Access Request").

Subject to the section below, the legal timescales for InterStudies to respond to a Subject Access Request is one calendar month.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed;
- and
- claim compensation for damages caused by a breach of the our data protection responsibilities.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## Contact:

If you would like to discuss anything in this privacy notice, please contact:  
Bo Slot Larsen, Data Protection Officer, [gdpr@interstudies.com](mailto:gdpr@interstudies.com)

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